

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

SAMSUNG ELECTRONICS AMERICA, INC.
and SAMSUNG ELECTRONICS CO., LTD.,

Plaintiffs,

v.

CF UNILOC HOLDINGS LLC,

Defendant.

C.A. No. _____

MOTION FOR LEAVE TO FILE UNDER SEAL

Plaintiffs Samsung Electronics America, Inc. and Samsung Electronics Co., Ltd. (together, “Samsung”) hereby move for an order permitting the filing of Samsung’s Motion to Compel CF Uniloc Holdings LLC’s Compliance with a Subpoena for Documents on an Expedited Basis (“Motion to Compel”) under seal. The grounds for this motion are as follows:

1. The Motion to Compel relies in detail on documents and testimony regarding commercially sensitive and confidential business information. These documents and testimony have been designated as “Highly Confidential - Attorneys’ Eyes Only” in the underlying cases: *Uniloc 2017 LLC v. Samsung Elecs. Am., Inc., et al.* C.A. No. 2:18-cv-00506-JRG-RSP (E.D. Tex.) (“506 Case) and *Uniloc 2017 LLC v. Samsung Elecs. Am., Inc., et al.* C.A. No. 2:18-cv-00508-JRG-RSP (E.D. Tex.) (“508 Case”).

2. Exhibits C and E to the Motion to Compel are documents containing commercially sensitive and confidential business information of Uniloc 2017 LLC (“Uniloc 2017”) and CF Uniloc Holdings LLC (“CF Uniloc Holdings”). Uniloc 2017 produced these documents in the 506 and 508 Cases, and Uniloc 2017 designated these documents as “HIGHLY CONFIDENTIAL –

ATTORNEYS' EYES ONLY" in accordance with the Protective Orders entered in the 506 and 508 Cases (506 Case, D.I. 23; 508 Case, D.I. 23).

3. Exhibit D to the Motion to Compel contains excerpts from the deposition transcript of Uniloc 2017's corporate witness, which includes the highly sensitive and confidential business information of Uniloc 2017. The deposition transcript has been designated as "HIGHLY CONFIDENTIAL – ATTORNEYS EYES ONLY."

Dated: January 14, 2020

OF COUNSEL:

Valerie W. Ho
GREENBERG TRAURIG, LLP
1840 Century Park East
Los Angeles, CA 90067

Richard Edlin
Allan A. Kassenoff
GREENBERG TRAURIG, LLP
MetLife Building, 200 Park Avenue
New York, NY 10002
Telephone: (212) 801-9200
Facsimile: (212) 801-6400
Email: edlinr@gtlaw.com
Email: kassenoffa@gtlaw.com

GREENBERG TRAURIG, LLP

/s/ Benjamin J. Schladweiler
Benjamin J. Schladweiler (#4601)
GREENBERG TRAURIG LLP
The Nemours Building
1007 North Orange Street
Wilmington, DE 19801

*Attorneys for Plaintiffs Samsung Electronics
America, Inc. and Samsung Electronics Co.,
Ltd.*

CERTIFICATE OF SERVICE

I hereby certify that on January 14, 2020, I caused copies of the foregoing document to be served upon the following at the email addresses indicated below:

Paul J. Hayes
James J. Foster
Kevin Gannon
PRINCE LOBEL TYE LLP
One International Place - Suite 3700
Boston, MA 02110
Tel: 617-456-8000
Email: phayes@princelobel.com
Email: jfoster@princelobel.com
Email: kgannon@princelobel.com

Edward R. Nelson III
ed@nelbum.com
Texas State Bar No. 00797142
NELSON BUMGARDNER PC
3131 West 7th Street, Suite 300
Fort Worth, TX 76107
Tel: (817) 377-9111
Fax: (817) 377-3485

ATTORNEYS FOR UNILOC 2017 LLC

James J. Foster
PRINCE LOBEL TYE LLP
One International Place - Suite 3700
Boston, MA 02110
Tel: 617-456-8000
Email: jfoster@princelobel.com

ATTORNEYS FOR CF UNILOC HOLDINGS LLC

/s/ Benjamin J. Schladweiler
Benjamin J. Schladweiler (#4601)